

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DEREK CARRIER and DORA
CARRIER, individually, and on
behalf of all others similarly situated;

Plaintiffs,

vs.

RAVI ZACHARIAS
INTERNATIONAL MINISTRIES,
INC., a 501(c)(3) Corporation; RZIM
PRODUCTIONS, INC., a Georgia
Non-Profit Corporation;
MARGARET ZACHARIAS, in her
Capacity as ADMINISTRATOR OF
THE ESTATE OF RAVI KUMAR
ZACHARIAS,

Defendants.

Case No.: 1:21-cv-03161-TWT

**PLAINTIFFS' EMERGENCY
MOTION FOR EXPEDITED
DISCOVERY AND REQUEST FOR
EXPEDITED HEARING**

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AND REQUEST FOR EXPEDITED HEARING**

Plaintiffs Derek Carrier and Dora Carrier ("Plaintiffs"), pursuant to Federal Rules of Civil Procedure Rule 26(d) and Local Rules 7.2(B) and 26.2(B), hereby file this emergency motion for entry of an order permitting expedited, limited discovery relating to the finances of Defendants Ravi Zacharias International Ministries, Inc., RZIM Productions, Inc. (together, "RZIM"), and Margaret

Zacharias, in her capacity as Administrator of the Estate of Ravi Kumar Zacharias (“Estate”) (collectively, “Defendants”).

Specifically, Plaintiffs seek an Order permitting Plaintiffs to begin limited discovery in this matter immediately and directing Defendants (1) to respond to Plaintiffs’ written discovery requests and produce documents in response to Plaintiffs’ requests for production within 14 days after entry of the requested order; and (2) to make themselves available for deposition, at a mutually convenient time, between 21 and 35 days after entry of the requested order. Copies of Plaintiffs’ proposed discovery requests are attached to this Motion as Exhibits A–H (“Discovery Requests”).

Plaintiffs respectfully request that this Motion be heard on an expedited basis. In support thereof, Plaintiffs state as follows:

1. Plaintiffs bring this Motion pursuant to Federal Rules of Civil Procedure Rule 26(d) and Local Rules 7.2(B) and 26.2(B) seeking the Court’s authorization to conduct expedited and immediate discovery as to Defendants’ financial status, including, but not limited to, an accounting of property and assets and an accounting of putative class donations, which are the subject of this lawsuit. Plaintiffs seek expedited hearing of this Motion due to the extraordinary circumstances which now exist. These circumstances include Defendants’ use, and

continued misuse, of Plaintiffs' donated funds, obtained by deceit, for the purpose of managing the fallout from their wrongful conduct and for purposes other than what donors intended in giving to RZIM. These circumstances also include the substantial likelihood that Defendants will engage in deceitful maneuvers to conceal, waste, or otherwise diminish the value of Defendants' property and assets, pending resolution of the claims Plaintiffs make in the Complaint. Plaintiffs and the putative Class are under immediate threat of being unable to recover any portion of their financial interest in Defendants' property and assets.

2. Plaintiffs and putative Class Members have an enforceable, legal claim to certain of Defendants' property and assets. Defendants have diverted improperly and misused property and assets funded by Plaintiffs and the putative Class. Accordingly, Plaintiffs must assess whether further action and/or intervention is necessary to protect their interests and that of the putative Class in ensuring that Defendants do not engage in additional, wrongful conduct that will deprive Plaintiffs and the putative Class of their interest in the property and assets.

3. In support of this Motion, Plaintiffs adopt and incorporate by reference the Complaint and Memorandum of Law filed contemporaneously herewith, as if set forth fully herein.

WHEREFORE, Plaintiffs request that the Court enter an order as follows:

A. Granting Plaintiffs' Emergency Motion for Expedited Discovery and Request for Expedited Hearing;

B. Ordering that Plaintiffs may serve their Discovery Requests on Defendants;

C. Ordering that Defendants serve responses to the Discovery Requests and produce the requested documents within 14 days after the entry of the Court's order;

D. Ordering that Defendants appear for depositions as requested in notices of deposition pertaining to the limited discovery sought herein between 21 and 35 days after the entry of the Court's order; and

E. Granting any such other and further relief the Court deems necessary and appropriate.

Alternatively, Plaintiffs request that this Court waive the time requirements for Defendants' response and schedule a hearing on this Motion at the Court's earliest convenience, in accordance with Local Rule 7.2(B).

Dated: August 25, 2021

By: /s/ Michael L. McGlamry
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CERTIFICATE OF SERVICE

I certify that the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to attorneys of record. In addition, this has been served via Certified Mail/Return Receipt Requested on the following:

Ravi Zacharias International Ministries, Inc.
Registered Agent, Jonathan T. McCants
3414 Peachtree Road, Suite 1150
Atlanta, GA 30326

RZIM Productions, Inc.
Registered Agent, Jonathan T. McCants
3414 Peachtree Road, Suite 1150
Atlanta, GA 30326

Margaret Zacharias, in her Capacity as
Administrator of the Estate of Ravi Kumar Zacharias
612 Foxhollow Lane
Alpharetta, GA 30004-9801

R. Matthew Martin, Esq.
Attorney for Estate of Ravi Kumar Zacharias
Dentons US LLP
303 Peachtree Street, N.E., Suite 5300
Atlanta, GA 30308

This 25th day of August, 2021.

/s/ Michael L. McGlamry
Michael L. McGlamry
POPE McGLAMRY, P.C.